

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, THE ESTATE
OF CHERRIGALE TOWNSEND and THE HELEN
CHRISTINE TOWNSEND MCDONALD TRUST

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED
SHEERAN, ATLANTIC RECORDING
CORPORATION, d/b/a ATLANTIC RECORDS,
SONY/ATV MUSIC PUBLISHING, LLC, and
WARNER MUSIC GROUP CORPORATION, d/b/a
ASYLUM RECORDS

Defendants.

ECF CASE

17-cv-5221 (LLS)

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record to the parties in this action, that:

1. Defendant Atlantic Recording Corporation produced an Excel spreadsheet in this action bearing bates stamp number DEF 3608 that reflects its revenues and expenses in relation to the United States exploitation of *Thinking Out Loud* (the “Atlantic P&L”).
2. Defendant Edward Christopher Sheeran produced an Excel spreadsheet in this action bearing bates stamp number DEF 3609 that reflects his revenues and expenses in relation to the United States exploitation of *Thinking Out Loud* (the “Sheeran P&L”).
3. Defendant Sony/ATV Music Publishing produced a PDF document in this action bearing bates stamp number DEF 3610 that reflects its revenues and expenses in relation to the United States exploitation of *Thinking Out Loud* (the “SATV P&L,” together with Atlantic P&L and the Sheeran P&L, the “Defendants’ P&Ls”).

4. The Defendants' P&Ls shall be admitted into evidence for all purposes during the damages portion of this case, without objection by either Plaintiffs or Defendants.

5. For the avoidance of doubt, notwithstanding the foregoing, the expenses as reflected on the Defendants' P&Ls may be challenged by the Plaintiffs with respect to whether any or all of such expenses reflected on the Defendants' P&Ls are properly deductible against the revenues reflected on Defendants' P&Ls, in whole or in part, under the Copyright Act and applicable law.

6. For the avoidance of doubt, it is further agreed that the profits reflected on Defendants' P&Ls are subject to further evidence by the parties apportioning such profits between those attributable to the alleged infringement and those that are not attributable to the alleged infringement.

Dated: October 8, 2020

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